

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ABSTRAX, INC.,

Plaintiff,

v.

HEWLETT-PACKARD COMPANY,

Defendant.

Case No. 2:14-CV-158-JRG

**JURY TRIAL DEMANDED**

**DECLARATION OF ROBERT CAMPBELL IN SUPPORT OF  
HEWLETT-PACKARD'S MOTION TO TRANSFER VENUE  
TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Robert Campbell, declare under penalty of perjury that the following is true and accurate to the best of my knowledge. I have personal knowledge of the information set forth herein and, if called to testify as a witness, could and would do so under oath.

1. I am a Distinguished Technologist and Chief Technologist for consumer PCs at Hewlett-Packard Company ("HP"). I lead the development of technologies for HP's consumer PCs. I joined HP in 1982 and have held a number of technologist positions within the company. I work in HP's Sunnyvale, California office.

2. HP's world headquarters and principal place of business is located at 3000 Hanover Street, Palo Alto, California 94304. HP is a Delaware corporation.

3. In addition to its Palo Alto headquarters, HP also maintains facilities in Sunnyvale, Fremont, and Roseville, all in Northern California. HP employs at least 11,000 people in its offices in Northern California. HP employs at least 14,000 people throughout the state of California.

4. A substantial portion of HP's research and development, as well as its product development concerning PCs and printers, takes place at its facilities in California. A substantial portion of the documents related to HP's research and development and product development is located in California. HP has at least 3,000 employees in these functions in Northern California.

5. A substantial portion of HP's marketing operations takes place at its facilities in California. A substantial portion of the documents related to HP's marketing efforts is located in California. Members of the Printing and Personal Systems Marketing Group have responsibility for regional marketing efforts associated with PCs and printers, is located in Sunnyvale and San Diego, California. HP has at least 900 employees in marketing functions in Northern California.

6. A substantial portion of HP's sales operations takes place at its facilities in California. A substantial portion of the documents related to HP's sales is located in California. Members of the Printing and Personal Systems WW Sales Group have responsibility for sales functions associated with PCs and printers, is located in Palo Alto and Sunnyvale, California. HP has at least 800 employees in sales functions in Northern California.

7. A substantial portion of HP's finance operations takes place at its facilities in California. A substantial portion of the documents related to HP's financial information is located in California. Members of the Printing and Personal Systems Finance Group have responsibility for finance functions associated with PCs and printers, is located in Palo Alto, Roseville and San Diego, California. HP has at least 500 employees in finance functions in Northern California.

8. I understand that plaintiff accuses the following types of HP products in this case: laptops, notebooks, ultrabooks, desktops, all-in-one PCs, storage, servers and blades, Factory

Express products, and/or Performance Optimized Data Centers. I understand that plaintiff accuses built-to-order (“BTO”), Factory Express and POD Works manufacturing processes.

9. HP performs Factory Express manufacturing at a facility located in Houston, Texas. The HP Houston campus is located at 20555 State Highway 249 in Houston Texas. In total, in excess 8,000 employees work in the Houston facility. HP manufactures performance optimized datacenters (“PODs”) in the Houston facility and/or at various locations in proximity to where the POD will be utilized.

10. HP’s BTO products are primarily manufactured by the following original design manufacturers (“ODMs”): Inventec Corporation, Foxconn / Hon Hai Logistics California, LLC, and Wistron Corporation. I understand that Foxconn manufactures some Factory Express HP products in Indiana. I understand that Inventec and Wistron manufacture HP accused products in Asia and Juarez Mexico.

11. I understand that Mr. Albert Tang is an HP business manager with responsibility for managing the relationship with HP ODMs. I understand that Mr. Tang lives in San Francisco, California. I understand that Mr. Tang maintains documents relating to this responsibility in the Northern District of California.

12. I understand that Mr. Mike Mixon is an HP manager of Factory Express worldwide process. I understand that Mr. Mixon maintains documents relating to this responsibility in the Northern District of California. I understand that Mr. Mixon lives in Newcastle California in the Sacramento area.

13. I understand that Mr. Wade Vinson is an HP Chief Architect for PODs. I understand that Mr. Vinson maintains documents relating to this responsibility in the Southern District of Texas. I understand that Mr. Vinson lives in the Houston area.

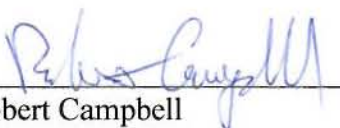


14. I understand that Mr. Harry Tang is an HP Chief Technologist in engineering and program management and is knowledgeable regarding the accused Factory Express process. I understand that Mr. Tang maintains documents relating to this responsibility in the Southern District of Texas. I understand that Mr. Tang lives in the Houston area.

15. HP does maintain a facility in Plano, Texas, but that facility and its employees are dedicated to HP's Enterprise Business unit and are not engaged in research, development, manufacture, assembly, production testing, marketing, sales or distribution of the accused HP products. HP is not aware of any witness that it expects to call at trial, or any employee with unique information relevant to this case, who is located in Plano. HP does not maintain any other facility in the Eastern District of Texas.

16. HP's products that are or were offered for sale in the United States have been offered for sale on a nationwide basis. HP products offered for sale in Texas also would be offered for sale throughout the country, including in California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, and that this declaration was executed on August 22, 2014, in Sunnyvale, California.

  
Robert Campbell